DRAFT
City of Milpitas
Green Infrastructure Plan Framework

Approved on: June 6, 2017

Approved by: Milpitas City Council

City of Milpitas

455 E. Calaveras Blvd.

Milpitas, CA 95035

In compliance with Provision C.3.j.i.(1) of Order R2-2015-0049

***Preface**: This document was prepared by SCVURPPP to assist Co-permittees to comply with requirements in Provision C.3.j.i.(1) of the Municipal Regional Stormwater NPDES Permit (MRP) to develop a Framework (or work plan) for preparing a Green Infrastructure Plan. It is intended to provide Co-permittees with a format and suggested content for their Green Infrastructure Plan Frameworks. The Framework must be approved by June 30, 2017 and submitted to the San Francisco Bay Regional Water Quality Control Board by September 30, 2017. The use of this document and associated guidance are at the discretion of each Co-permittee.*

The purpose of the Framework is to describe the steps the City of Milpitas will take, the resources needed, and the schedule to develop a Green Infrastructure (GI)Plan per the requirements of the Municipal Regional Stormwater National Pollutant Discharge Elimination System Permit.

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ABBREVIATIONS

BASMAA	Bay Area Stormwater Management Agencies Association
Caltrans	California Department of Transportation
CASQA	California Stormwater Quality Association
CEQA	California Environmental Quality Act
CIP	Capital Improvement Program
COA	Condition of Approval
EPA	Environmental Protection Agency
FY	Fiscal Year
GI	Green Infrastructure
GIS	Geographic Information System
GSI	Green Stormwater Infrastructure
Hg	Mercury
LID	Low Impact Development
LUS	Watershed Management Initiative Land Use Subgroup
MC	Management Committee
MEP	Maximum Extent Practicable
MRP	Municipal Regional Stormwater NPDES Permit
MS4	Municipal Separate Storm Sewer System
NGO	Non-Governmental Organization
NPDES	National Pollutant Discharge Elimination System
O&M	Operation and Maintenance
PCBs	Polychlorinated Biphenyls
PIP	Public Information and Participation
POC	Pollutant of Concern
Program	Santa Clara Valley Urban Runoff Pollution Prevention Program
RFP	Request for Proposal
ROW	Right of Way
RWQCB	San Francisco Bay Regional Water Quality Control Board
SCBWMI	Santa Clara Basin Watershed Management Initiative
SCVURPPP	Santa Clara Valley Urban Runoff Pollution Prevention Program
SCVWD	Santa Clara Valley Water District
SFEI	San Francisco Estuary Institute
SFEP	San Francisco Estuary Partnership
State Board	State Water Resource Control Board
SWRP	Storm Water Resource Plan
SWRCB	State Water Resource Control Board
TMDL	Total Maximum Daily Load
Water Board	San Francisco Bay Regional Water Quality Control Board
Water District	Santa Clara Valley Water District
WDR	Waste Discharge Requirements
WMI	Watershed Management Initiative

1.0 INTRODUCTION

1.1 What is Green Infrastructure?

"Green Infrastructure" (GI), also known as "Green Stormwater Infrastructure" (GSI), is infrastructure that uses vegetation, soils, and natural processes to manage water and create healthier urban environments. At the scale of a city or county, green infrastructure refers to the patchwork of natural areas that provides habitat, flood protection, cleaner air, and cleaner water. At the scale of a neighborhood or project site, green infrastructure refers to stormwater management systems that mimic nature by soaking up and storing water.

Examples of GI include resilient, sustainable systems that slow, filter, harvest, infiltrate and/or evapotranspirate runoff such as: landscape-based stormwater "biotreatment" using soil and plants ranging in size from grasses to trees; pervious paving systems (e.g., interlocking concrete pavers, porous asphalt, and pervious concrete); rainwater harvesting systems (e.g., cisterns and rain barrels); and other methods to capture and treat stormwater. These practices are also known as Low Impact Development (LID) site design and treatment measures.

GI roadway projects are typically called "Green Streets". Another term of art related to street design is "Complete Streets". This term comes from the transportation field and deals with the designing of streets that incorporate all modes of travel equally - in particular to increase safety and access for cyclists and pedestrians. The integration of the goals of both Complete Streets and Green Streets has coined several new terms such as "Living Streets", "Better Streets" and "Sustainable Streets". This movement recognizes that environmentally and holistically designed streets achieve many benefits: increased multi-modal travel and safety; clean water and air; climate change resilience and mitigation; placemaking and community cohesion; habitat and energy savings; and higher property values.

[Describe the terminology that your municipality will use for the GI Plan.]

1.2 Stormwater Quality Regulatory Requirements

The City of Milpitas is subject to the requirements of the recently reissued Municipal Regional Stormwater National Pollutant Discharge Elimination System (NPDES) Permit for Phase I municipalities and agencies in the San Francisco Bay area (Order R2-2015-0049), also known as the Municipal Regional Permit (MRP), which became effective on January 1, 2016. The MRP applies to 76 large, medium and small municipalities (cities, towns and counties) and flood control agencies that discharge stormwater to San Francisco Bay, collectively referred to as Permittees.

Over the last 13 years, under the MRP and previous permits, new development and redevelopment projects on private and public property that exceed certain size thresholds ("Regulated Projects") have been required to mitigate impacts on water quality by incorporating site design, pollutant source control, stormwater treatment and flow control measures as appropriate. LID treatment measures, such as rainwater harvesting and use, infiltration, and biotreatment, have been required on most

Regulated Projects since December 2011. Construction of new roads is covered by these requirements, but projects related to existing roads and adjoining sidewalks and bike lanes are not regulated unless they include creation of an additional travel lane.

A new section of the MRP requires Permittees to develop and implement long-term Green Infrastructure (GI) Plans for the inclusion of LID measures in storm drain infrastructure on public and private lands, including streets, roads, storm drains, parking lots, building roofs, and other elements. The GI Plan must be completed by September 30, 2019. As part of the GI planning process, the MRP requires Permittees to adopt a *Green Infrastructure Plan Framework* (Framework) by June 30, 2017 and submit it to the Regional Water Quality Control Board (Water Board) by September 30, 2017. The Framework, a work plan for completing the GI Plan, must at a minimum include a statement of purpose, tasks and timeframes to complete the required elements of the GI Plan.

Other sections of the MRP include requirements for municipalities to control pollutants of concern to water quality in stormwater discharges, including polychlorinated biphenyls (PCBs), mercury, trash and pesticides. LID measures incorporated into green infrastructure can help remove these pollutants from stormwater runoff. For this reason, the MRP establishes a new linkage between public infrastructure retrofits and required reductions in discharges of certain pollutants, specifically PCBs and mercury. Over the next few decades, Permittees must reduce the loads of PCBs and mercury in stormwater discharges through various means, with a portion of these load reductions achieved through the installation of GI systems. Permittees in Santa Clara County, collectively, must implement GI on public and private property to reduce mercury loading by 16 grams/year and PCB loading by 37 grams/year by 2020. The load reductions will continue in future permits. Therefore, these efforts will be integrated and coordinated countywide for the most effective program. Other pollutants, including trash and pesticides, should also be coordinated with the GI program since, when properly designed, constructed and maintained, biotreatment systems may also be credited towards trash and pesticide reduction goals.

A key part of the GI definition in the MRP is the inclusion of both private and public property locations for GI systems. This has been done in order to plan, analyze, implement and credit GI systems for pollutant load reductions on a watershed scale, as well as recognize all GI accomplishments within a municipality. However, the focus of the GI Plan and Framework is the integration of GI systems into public rights-of-way. The GI Plan is not intended to impose retrofit requirements on private property, outside the standard development application review process for projects already regulated by the MRP, but may provide incentives or opportunities for private property owners to add or contribute towards GI elements if desired.

1.3 Purpose of Green Infrastructure Plan and Framework

The purpose of the City of Milpitas GI Plan is to describe how the City will gradually transform its urban landscape and storm drainage systems from "gray" to "green"; that is, shift from traditional storm drain infrastructure, where stormwater runoff flows directly from impervious surfaces into storm drains and receiving waters, to a more resilient, sustainable system that reduces and slows runoff by dispersing it to vegetated areas, promotes infiltration and evapotranspiration, collects runoff for nonpotable uses, and

treats runoff using biotreatment and other green infrastructure practices. The GI Plan will also be used to demonstrate the City's long-term commitment to implementation of green infrastructure to help reduce loads of pollutants of concern, particularly mercury and PCBs, discharged in stormwater to local waterways. The GI Plan will be coordinated with other City plans, such as land use, transportation, parks, urban forestry, and sustainability plans, to achieve multiple potential benefits to the community, including improved water and air quality, reduced flooding, increased water supply, traffic calming, safer pedestrian and bicycle facilities, climate resiliency, improved wildlife habitat, and a more pleasant urban environment.

The purposes of this Framework are to:

1. Provide some background on the MRP requirements for GI Planning;
2. Describe the purpose, goals, and tasks to develop the City's *GI Plan*; and,
3. Outline the time frames for the creation of the City's GI Plan and other GI tasks required in the MRP.

This Framework was reviewed by the Milpitas Planning Commission and approved for submittal to the Water Board by the Milpitas City Council. The City's Staff Report and Resolution are attached as Appendix A and Appendix B, respectively.

This Framework is submitted by the City of Milpitas in compliance with MRP Provision C.3.j.i.(1).

The Framework must be approved by June 30, 2017 and submitted with the Fiscal Year 2016-17 Annual Report to the Water Board by September 30, 2017.

1.4 City of Milpitas Description and Background

Incorporated January 26, 1954, the City of Milpitas is located in Santa Clara County, and has a jurisdictional area of 8,640 acres. According to the 2010 Census, it has a population of 66,790, with a population density of 4,947.4 people per square mile and average household size of 3.34. The median household income was $94,589 in 2010. The City of Milpitas is home to an array of high technology firms and retail centers. The City of Milpitas is home to innovative, ground-breaking, and inspirational companies such as Flex, Cisco Systems, KLA-Tencor, FireEye, and View Glass Dynamic, among many others. There are seven types of land uses within the City of Milpitas. These include commercial and services, industrial, residential, retail, K-12 schools, urban parks and hillsides open space. Rich in outdoor recreation amenities, Milpitas offers 34 community parks, 24 tennis courts, and a dynamic, multi-sport complex, while also providing a multitude of outstanding recreational opportunities, including aquatics, cultural arts and theater, sports leagues and activities, youth programming, and senior activities and services.

A description of the City of Milpitas characteristics is provided below:

- Incorporated Milpitas encompasses 13.5 square miles, all of which are within the 315 square mile Coyote Creek watershed;
- The City lies at the base of the Diablo Range, extending from its foothills on an alluvial plain of the Santa Clara Valley toward San Francisco Bay. Almost half of the city is east of Interstate 680, where elevations vary from about 40 feet mean sea level at Evans Road to almost 800 feet at Monument Peak just west of Calaveras Reservoir. Once on the valley floor, the land falls away from the base of the hills toward the west, and approaches sea level along the bay;
- The hillside area (which comprises almost one half of the city) is generally zoned for permanent open space, and includes Ed Levin Regional Park;
- Significant water bodies include Coyote Creek to the west and Calaveras Reservoir to the east;
- Local runoff flows into creeks and channels that run through the city, ultimately discharging to San Francisco Bay. Drainage in Milpitas generally is from the southeast to the northwest. Storm drain systems close to the bay also tend to rely heavily upon pumping facilities to move water.
- Most of the 13.5 square miles of land is situated between two major freeways (I-880 and I-680) and a county expressway. The City has approximately 10 square miles of valley floor to the west and four square miles of hillside areas to the east.
- Seven types of land uses and zoning (commercial and services, industrial, residential, retail, K-12 schools, urban parks and hillsides open space;
- The City of Milpitas has 23 general plan designations and 20 zoning designations. The majority of dwelling units and structures of the City of Milpitas are located in zoning designations labeled "Single-Family Low Density" and "Multi-Family High Density."
- In an effort to proactively limit stormwater runoff, the City allows only either the width of the garage, or 50% of the lot width measure fat the front property line to be paved in "Single-Family Low Density" areas. For higher "Multi-Family High Density" residential areas, the City requires a minimum of 25% of the total lot area shall be landscaped or recreational open space, to further discourage impervious surfaces where stormwater does not filtrate into the ground.
- Development in Milpitas, particularly non-hillside residential, will tend to be infill development which will become denser as property values escalate;
- Recent land use changes and growth have been most concentrated within the Midtown and Transit Area Specific Plan (TASP) areas;
- Storm runoff in Milpitas is collected in a system including over 3,000 catch basins, underground pipes and a network of street gutters;
- Regular and emergency street maintenance includes the cleaning and repair of 138 street miles and sidewalks and the sweeping of 11,600 street curb miles annually.

The City of Milpitas has developed growth/development forecasts as part of its General Plan. The following section describes projection scenarios with years and estimated percent growth in population and/or additional square footage of residential and non-residential buildings.

*Describe the **types of growth projections** developed either as part of a General Plan or other planning document through at least 2040 if possible. If no growth projections, generally describe the expectations for growth.*

1.5 City of Milpitas Goals and Overall Approach

Describe City's specific goals and overall approach to green infrastructure planning, based on its community characteristics and vision for future development, or the process by which the municipality will determine its goals and approach. This may include a community-based process, involving the general public, the development community, local organizations, etc.

The City of Milpitas strives to provide efficient mechanisms to limit the discharge of stormwater runoff. Staff relies on regulations set forth in Chapter 16 (Stormwater and Urban Runoff Pollution Control) of the Zoning Code. Such regulations include:

- Requiring all regulated projects not participating in an alternative of in lieu compliance program to design and construct Low Impact Development source control, site design and stormwater treatment measures in order to reduce water quality impacts of urban runoff from the entire project site for the life of the project.
- Requiring low impact development measures to be incorporated in to all applicable plan documents.
- Ability to inspect whenever necessary that the City has cause to believe that there exists, or potentially exists, in or upon any premises any condition withch constitutes a violation of the Stormwater and Urban Runoff Pollution control chapter.

The City will continue to adhere to the requirements set forth above regarding future development that may impact stormwater runoff.

An overall goal moving forward will be to increase stormwater treatment area and reduce impervious area. The tasks to achieve this goal are:

- Perform a GI Feasibility Study to identify opportunities/options with associated costs that are applicable for Milpitas to implement to meet the Goal.
- Visit various sites that demonstrate GI elements.
- Incorporate GI requirements into applicable guiding documents, such as the General Plan update, Specific Plan updates, Design Guidelines updates, etc.
- Incorporate GI requirements into applicable public or private projects.
- Develop and implement a pilot project at public facilities.

2.0 GREEN INFRASTRUCTURE PLAN ELEMENTS & APPROACH

2.1 Summary of Required Elements

To meet MRP requirements, the City of Milpitas Green Infrastructure (GI) Plan will need to contain certain mandatory elements:

- **Project Identification and Prioritization Mechanism**: The GI Plan must describe the mechanism by which the City of Milpitas will identify, prioritize and map potential and planned projects that incorporate green infrastructure components in different drainage areas within the City of Milpitas. These include public and private projects that may be implemented over the long term, with milestones for implementation by 2020, 2030, and 2040. The mechanism must include the criteria for prioritization and outputs that can be incorporated into the City of Milpitas long-term planning and capital improvement processes.
- **Prioritized Project Locations and Timeframes**: The GI Plan must contain the outputs resulting from the identification and prioritization mechanism described above, such as lists and maps of prioritized projects and timeframes for implementation. The outputs must also include "targets" or estimates of how much impervious surface within the City of Milpitas will be converted or "retrofit" to drain to a green infrastructure feature, such as a vegetated area or stormwater capture or treatment facility, by the 2020, 2030, and 2040 milestones.
- **Completed Project Tracking System**: The GI Plan must describe the City of Milpitas' process for tracking and mapping completed public and private projects and making the information available to the public.
- **Guidelines and Specifications**: The GI Plan must include general design and construction guidelines, standard specifications and details (or references to those documents) for incorporating green infrastructure components into projects within the City of Milpitas. These guidelines and specifications should address the different street and project types within the City of Milpitas, as defined by its land use and transportation characteristics, and allow projects to provide a range of functions and benefits, such as stormwater management, bicycle and pedestrian mobility and safety, public green space, urban forestry, etc.
- **Integration with Other Plans**: The GI Plan must describe its relationship to other planning documents and efforts within the City of Milpitas and how those planning documents have been updated or modified, if needed, to support and incorporate the green infrastructure requirements. If any necessary updates or modifications have not been accomplished by the completion of the GI Plan, the GI Plan must include a work plan and schedule to complete them.

- **Evaluation of Funding Options**: The GI Plan must include an evaluation of funding options for design, construction, and long-term maintenance of prioritized green infrastructure projects, considering local, state and federal funding sources.

In addition, the City of Milpitas must adopt **policies, ordinances, and/or other appropriate legal mechanisms** to allow implementation of the GI Plan. The City of Milpitas must also **conduct outreach and education** to elected officials, department managers and staffs, developers and design professionals, and the general public as part of development and implementation of the GI Plan and implementation of specific projects within the GI Plan.

2.2 Approach to Completion of Required Elements

The City of Milpitas is committed to working within its Planning, Engineering and Public Works Departments and with the Santa Clara Valley Water District and SCVURPPP to complete the required GI Plan elements described in Section 2.1. This section describes the City of Milpitas' approach to each required element.

2.2.1 Outreach and Education

One of the first and most important steps in the development of the GI Plan is educating a municipality's department staff, managers, and elected officials about the purposes and goals of green infrastructure, the required elements of the GI Plan, and steps needed to develop and implement the GI Plan, and get their support and commitment to the Plan and this new approach to urban infrastructure. Another important first step is local community and stakeholder outreach to gain public support. The City of Milpitas began this process in FY 15-16 and FY 16-17 by completing the following tasks:

- Convened three interdepartmental meetings with affected department staff and management to discuss GI requirements and assigned tasks.
- Discussed with appropriate department staff the MRP requirements to analyze proposed capital projects for opportunities to incorporate GI, and completed the first list of planned and potential GI projects.
- Provided training to department staff on GI requirements and strategies using the GI workshops and other training tools developed by SCVURPPP.
- Engaged appointed (Planning Commission) and elected officials (City Council) with a presentation on GI during a study session or regular meeting to raise awareness of the goals and requirements in the MRP and the concepts, intent and multiple benefits of GI.

- Conducted one presentation to the Planning Commission in May 2017 to achieve necessary outcomes. Provided opportunity for the public to give input as appropriate either this meeting of the appointed officials.
- Brought a resolution and staff report to the Milpitas City Council in June 2017 to provide direction to management staff on the assignment of staff and possible establishment of a GI committee with a set of tasks and schedule.
- Coordinated with SCVURPPP on a comprehensive outreach and education program. Key audiences include: the general public (countywide, and in the neighborhood or municipality where GI projects are located); the development community (e.g., developers, engineers, landscape architects, and contractors); and elected officials. Incorporated the materials produced by SCVURPPP into outreach efforts on the local level.
- Participated in the stakeholder working group for the Santa Clara Valley Water District and SCVURPPP project to develop a Storm Water Resource Plan (SWRP) for the Santa Clara Basin.

The City of Milpitas will conduct or continue to conduct the following education and outreach activities as part of development of the GI Plan:

- Inter-department meetings to get input on the GI Plan.
- Update elected and appointed officials on GI Plan development and schedule for adoption.
- Provide outreach to the local community and other stakeholders to get input and support for the GI Plan.
- Provide outreach to the general public and development community in coordination with SCVURPPP.
- Conduct internal training as needed, and send staff to SCVURPPP trainings.
- Continue to participate in the stakeholder working group for the District/SCVURPPP SWRP.

2.2.2 Project Identification and Prioritization

The City of Milpitas will use the following approaches to identify, prioritize and map potential and planned projects that incorporate green infrastructure components in different drainage areas within the City of Milpitas:

a. **Coordination with the Santa Clara Basin Stormwater Resource Plan**: The Santa Clara Valley Water District (District) and SCVURPPP obtained a Proposition 1 Stormwater Grant Program planning grant to develop a Stormwater Resource Plan (SWRP) for the Santa Clara Basin. The SWRP will support the development and implementation of GI Plans within the Basin (including the City of Milpitas GI

Plan)through identification of local and regional opportunities for GI projects and development of modeling tools for estimating pollutant load reductions over future timeframes. The resulting maps and tools will be available for local use by participating municipalities.

The SWRP will also produce a list of prioritized GI projects eligible for future State implementation grant funds. Building on existing documents that describe the characteristics and water quality and quantity issues within the Santa Clara Basin, the SWRP will identify and prioritize multi-benefit GI projects throughout the Basin, using a metrics-based approach for quantifying project benefits such as volume of stormwater infiltrated and/or treated and quantity of pollutants removed. The metrics-based analysis will be conducted using hydrologic/hydraulic and water quality models coupled with GIS resources and other tools. The products of these analyses will be a map of opportunity areas for GI projects throughout the watershed, an initial prioritized list of potential projects and strategies for implementation of these and future projects. The list of potential projects within the City of Milpitas will then be incorporated into the City's list for its GI Plan.

The scope of work and schedule for the SWRP is provided in Appendix C.

b. **Review of Capital Improvement Program Projects for Green Infrastructure Opportunities**: As required by the MRP, the City of Milpitas has begun to prepare and maintain a list of public and private GI projects that are planned for implementation during the permit term, and public projects that have potential for GI measures. The first such list was submitted with the FY 15-16 Annual Report. These lists will be used to provide potential projects for inclusion in the SWRP development and incorporation into the GI Plan.

c. **Use of Additional Tools to Identify, Prioritize and Map Potential GI Projects**: Additional efforts will be to to improve GIS mapping and analyses of activities taken by other jurisdictions to identify, prioritize and map projects.

The GI Plan will also describe the tools and approaches used, the criteria for prioritization, and the outputs that can be incorporated into the City of Milpitas' long-term planning and capital improvement processes.

2.2.3 Prioritized Project Locations and Timeframes

The GI Plan will include the prioritized list of projects and map of locations within the City's jurisdiction resulting from Task 2.2.2 above, as well as timeframes for implementation. The outputs will also include "targets" or estimates of how much impervious surface within the City will be converted or "retrofit" to drain to a green infrastructure feature, such as a vegetated area or stormwater treatment facility, or converted to pervious surfaces, by the 2020, 2030, and 2040 milestones.

2.2.4 Completed Project Tracking System

This section of the GI Plan must describe the City's process for tracking and mapping completed public and private projects and making the information available to the public. The City of Milpitas will work with SCVURPPP to develop a consistent countywide approach to tracking and mapping completed projects and estimating expected PCB and mercury load reductions resulting from these projects.

2.2.5 Guidelines and Specifications

The City of Milpitas will support and participate in the SCVURPPP process to develop and adopt GI Design Guidelines and Specifications for streetscapes and other public infrastructure. A set of model Guidelines and Specifications will be developed at the countywide level which will be used as a reference by the City of Milpitas. City staff will evaluate the model Guidelines and Specifications for consistency with its own local standards, and revise existing guidelines, standard specifications, design details, and department procedures as needed.

The Guidelines and Specifications will also include the results of the regional analysis of alternative approaches to sizing GI facilties where project constraints (e.g., limited space in public right-of-way, utility conflicts, etc.) preclude fully meeting the permit-required sizing criteria for such facilities. The scope of work for the regional project being conducted to address this requirement is provided in Appendix D.

2.2.6 Integration with Other Municipal Plans

The City of Milpitas has reviewed its existing municipal planning documents and Identified which documents need to be updated or modified to support and/or be consistent with the GI Plan, and the timing for those updates or modifications. A summary of the results of the municipal plan review and the schedule for updates or modifications is presented in Table 2 below. If any necessary updates or modifications

have not been accomplished by the completion of the GI Plan, the GI Plan will include a work plan and schedule to complete them.

Table 2. Schedule for Municipal Plan Updates for Green Infrastructure

Name of Plan	Last Updated	Next Projected Update	Includes Language to Support GI?	If No, Date to Complete GI Update
General Plan - Element			Yes/No	
Transit Area Specific Plan				
Midtown Specific Plan				
Bicycle/Pedestrian Plan				
Storm Drain Master Plan	July 2013	TBD	No	
Urban Forestry Plan???				
Parks/Open Space Plan???				

Names of relevant plans; if not completed the review of certain plans to determine whether an update is needed, put "TBD" in the fourth column. If a plan already includes GI-related language (i.e., you've entered "Yes" in the fourth column), dates of past and future updates are not needed and can be designated as not applicable, or "NA".

2.2.7 Evaluation of Funding Options

The City of Milpitas currently uses a combination of federal and state grants and development fees to fund construction of projects in its capital improvement program (CIP) and other projects. A combination CIP and operating year funding is used for public street, parking lot and building maintenance; maintenance of stormwater control measures installed at public projects; and maintenance of other landscaped areas (e.g., parks, medians, public plazas, etc.)

The City of Milpitas will analyze possible funding options to raise additional revenue for the projects that will eventually be included in the agency's GI Plan, including capital and operation and maintenance (O&M) costs of these projects. Options for capital project funding include the State Proposition 1 Stormwater Grant Program implementation grants, Prop 1 IRWMP grants, and California Urban Rivers Grants.

Additional funding options that will be explored by City of Milpitas include:

- **Treatment at an Offsite Location** – An alternative compliance option in which a private Regulated Project (one required to treat runoff from created and

replaced impervious surface on the project) would instead treat runoff from an equivalent amount of impervious surface offsite, potentially in the public right-of-way, in LID treatment facilities it would pay to construct (and/or maintain). That is, the private developer would fund and oversee construction of a potential green infrastructure project identified by City staff.

- **Payment of In-Lieu Fees** – An alternative compliance option in which the developer of a private Regulated Project, in lieu of constructing LID treatment facilities on-site, would pay equivalent in-lieu fees for construction and maintenance of a regional or municipal stormwater treatment (green infrastructure) facility.
- **Public-Private Partnerships** – An option in which green infrastructure facilities are jointly funded by the municipality and a private organization or land owner for the benefit of both parties.

Additional analysis needed to complete funding options during FY 16-17. Additional references include the San Mateo County study entitled "Potential Funding Source Analysis and Recommendations", and the CASQA LID Funding White Paper (to be completed in Fall 2016).

2.2.8 Adoption of Policies, Ordinances, and Other Legal Mechanisms

The City of Milpitas will review its existing policies, ordinances, and other legal mechanisms related to current planning procedures and implementation of stormwater NPDES permit requirements to Identify which documents may need to be updated or modified to help implement the GI Plan, and the timing for those actions. A summary of the results of the policy, ordinance, and legal mechanisms review and the schedule for actions is presented in Table 3 below. All needed updates, modifications, or new mechanism(s) will be completed and adopted (if necessary) by September 30, 2019.

Table 3. Schedule for Municipal Policy, Ordinance and Legal Mechanism Updates [To be completed]

Policy/Ordinance/Legal Mechanism	Description	Update Needed?	Update Schedule

In the GI Plan (or separately in the 2019 Annual Report), the City of Milpitas will describe any updates to ordinances, policies, plans or programs needed to implement the GI Plan and associated programs, or state that existing mechanisms are sufficient to implement the GI Plan.

2.2.9 Completion and Adoption of the GI Plan

The City of Milpitas will draft its GI Plan to contain all of the elements described above, obtain reviews and approvals by various departments, Milpitas City Council, and the public as needed, and submit the GI Plan to the Water Board by September 30, 2019. Internal deadlines to complete and adopt the GI Plan are presented in Table 4 below.

Table 4. Schedule for Completion and Adoption of GI Plan

Task	Department(s)	Deadline
Prepare draft GI Plan	Planning, Engineering, Public Works	FY 17-18
Review draft GI Plan	Departments	FY 17-18
Public input on draft GI Plan	Public	FY 17-18
Approve draft GI Plan	Planning, Engineering, Public Works	FY 17-18
Review/consider draft GI Plan for recommendation to City Council	Milpitas Planning Commission	FY 18-19
Approve final GI Plan	Milpitas City Council	FY 18-19

3.0 GREEN INFRASTRUCTURE PLAN DEVELOPMENT SCHEDULE

This section describes the time frames for completion of the tasks presented in Section 2 to develop and adopt the City of Milpitas GI Plan.

Include *tasks and schedule, below. Provide a description of any assumptions or other information related to the schedule.*

Task No.	Green Infrastructure Plan Development Task	Responsible Department(s)	Estimated Completion Date
1	Adopt the Resolution for GI Plan	Planning, Engineering, Public Works	FY 16-17
2	Perform GI Feasibility Study and visit various GI sites and develop a pilot project at public facilities; Incorporate GI requirements into various guiding documents	Planning, Engineering	FY 17-18
3	Implement a pilot project at public facilities, and facilitate private projects for GIs	Planning, Engineering, Public Works	FY 18-19